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8 *Attorneys for Respondents Tera Hanks, Ashmi Elizabeth ang, Ahmed Musiol, Mitz  
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10 **UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

11 BLAKE LIVELY,

12 *Movant,*

13 v.

14 TERA HANKS, ASHMI ELIZABETH  
15 ANG, AHMED MUSIOL, MITZ  
16 TOSKOVIC, AJ MARBORY,  
17 JENNIFER BENSON, SHEKINAH  
18 REESE, AND JARRIESSE  
BLACKMON,

19 *Respondents.*  
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Case No.: 2:25-mc-00055

**DECLARATION OF SUMMER E.  
BENSON IN SUPPORT OF  
RESPONDENTS' POSITION IN  
THE JOINT STIPULATION IN  
OPPOSITION TO MOVANT  
BLAKE LIVELY'S MOTION TO  
COMPEL COMPLIANCE WITH  
THIRD-PARTY SUBPOENAS**

**DECLARATION OF SUMMER E. BENSON**

I, Summer E. Benson, declare as follows:

1. I am an attorney at law licensed to practice in the State of California and admitted before this Court. I am an attorney with the law firm of Liner Freedman Taitelman + Cooley, LLP and counsel of record for Respondents Tera Hanks, Mitz Toskovic, Ahmed Musiol, Ashmi Elizabeth Dang, Jariesse Blackmon, AJ Marbory, and Jennifer Benson (collectively, the "Wayfarer Third Parties") in this action. I submit this declaration in support of the Wayfarer Third Parties' Position in the Joint Stipulation Regarding Movant Blake Lively's ("Lively") Motion to Compel Discovery (the "Motion").

2. Attached hereto as Exhibit 1 is a true and correct copy of a letter submitted to the United States District Court for the Southern District of New York by the Wayfarer Third Parties on or about June 13, 2025.

3. Attached hereto as Exhibit 2 is a true and correct copy of email correspondence between counsel for the Wayfarer Third Parties and counsel for Lively from June 6 to 13, 2025.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 16<sup>th</sup> day of June, 2025 at Los Angeles, California.

  
Summer E. Benson